

United States Corporation, 701 Brazos Street, Suite 1050, Austin, Texas 78701.

4. Defendant, Gemaco, Inc., is a foreign corporation organized under the laws of the State of Missouri, and can be served with process upon its registered agent, SNR Registered Agent Services, Inc., 4520 Main, Suite 1100, Kansas City, Missouri, 64111. SNR Registered Agent Services' registered agent is David Gatchell. Service can also be made on Gemaco's president, D. Kaye Summers, its vice-president, Jason Fitzhugh, or its secretary, Danny R. Carpenter, all at 2925 N. 7, Highway, Blue Springs, Missouri 64014.

II. JURISDICTION & VENUE

5. This action arises under the Copyright Act of 1976, Title 17, United States Code. Subject matter jurisdiction is founded on Title 28, United States Code § 1338(a).

6. This Court has general jurisdiction over Hyatt Gaming and Hyatt Corporation because they do business in this State. Specifically, Hyatt Corporation has held a Certificate of Authority to do business in Texas since 1972, currently and has at all times relevant to this action maintained a registered agent in Texas, and has maintained significant operations in this state, including the operation of one or more hotels in Travis County.

7. Hyatt Gaming, a wholly owned subsidiary of Hyatt Corporation, is organized for the sole purpose of managing Hyatt's casino operations at several of its hotels throughout the United States, Canada and the Caribbean, including the one in Aruba at issue in this suit. The two corporations operate as a single business enterprise, with Hyatt Gaming operating under the sole and total control of Hyatt Corporation, and both having a common objective and high levels of coordination toward that objective. Both operate under the common tradenames "Hyatt", "Hyatt Regency Aruba", and "Hyatt Regency Aruba Resort and Casino", and coordinate their internet and other advertising, as well as reservation systems. Moreover, they share officers and

directors, including but not limited to, Harold S. Handelsman, a secretary and director of both entities. In this regard, the acts subjecting Hyatt Corporation to general jurisdiction in Texas are attributable to Hyatt Gaming to similarly establish general jurisdiction.¹

8. Moreover, Hyatt Gaming actively solicits high stakes gamblers residing in Texas both on its own, and through "Player Representatives" located in Texas. Hyatt Gaming has a contractual relationship with these "Player Representatives" who are Texas residents. These constitute acts subjecting Hyatt Gaming to general jurisdiction through its own activities, in addition to those of Hyatt Corporation that may be imputed to it.

9. Gemaco markets and sells its products to Texas residents both under its own name as well as various affiliated companies, all owned in common by Gemaco's parent, GemGroup, Inc. These products include, but are not limited to, candy imprinted with the customers' chosen text or design sold at "www.GourmetGems.com," as well as playing cards also imprinted with the customers' chosen text or design at "www.promotionalcards.com", "www.countryclubcards.com," and "www.gemacocards.com." All jurisdictional contacts of GemGroup may be imputed to Gemaco because the latter operates under the sole and total control of GemGroup, and both have a common objective and high levels of coordination toward that objective. As evidence of the level of control, GemGroup and Gemaco share identical officers and directors, and share identical offices and facilities.

10. In addition to general jurisdiction, this Court has specific jurisdiction over Gemaco for its distribution of the copyrighted images to Texas residents. Specifically, Gemaco produces a brochure that contains the blackjack table top with the copyrighted maps at issue.

¹ *Turan v. Universal Plan Investments, Ltd.*, 248 F.3d 1139 (5th Cir. 2001) (citing *Walker v. Newgent*, 583 F.2d 163, 167 (5th Cir.1978) for proposition that "[a]lthough *Hargrave* analyzed the elements necessary to subject a *parent* to personal jurisdiction because of the activities of its *subsidiary*, 'the same

The table top is contained at pages 12 and 13 of the brochure, a copy of which is attached as Exhibit D. The brochure is available for download by Texas residents and has been mailed to residents in Texas. Moreover, Gemaco advertises the table top on its website, a copy of which is attached as Exhibit E.

11. For the same reasons justifying jurisdiction in this State, venue is conferred in this judicial district by Title 28, United States Code, Section 1400(a).

III. FACTS COMMON TO ALL CAUSES OF ACTION

12. Plaintiff is engaged in the business of creating, producing, and marketing antique-style, water color maps of the Caribbean islands and other locations around the World. These maps are sold as large printed copies of their respective originals, post cards, and in other mediums.

13. Plaintiff is the owner of the copyright in maps entitled "Aruba" and "Caribbean I", the maps at issue in this suit. Copies of the certificates of registration for both maps are attached as Exhibit A. Victor W. Baker, the registered owner of the map, is the sole shareholder of One Treasure Limited, Inc., and has assigned his interest in the maps to the One Treasure Limited. Copies of both maps are attached as Exhibit B.

14. Defendants operate a hotel and casino in Aruba under various tradenames, including "Hyatt", "Hyatt Regency Aruba", and "Hyatt Regency Aruba Resort and Casino". The casino has the typical assortment of games found in casinos, including blackjack tables. Defendants have imprinted the playing surface of at least one of those blackjack tables with the two maps at issue. Photographs of that table are attached as Exhibit C. It should be noted that various components of the original works have been manipulated on the table. For example, the

legal principles apply' when jurisdiction is sought over the *subsidiary* because of the activities of its *parent*" (emphasis original)).

sailing ship located toward the bottom of "Aruba" has been moved to the upper right of the map on the table. Also, the crest of "Aruba" has been edited by removing the original content of the crest and replacing it with "Carribean I". In addition, various place names on "Caribbean I" have been moved or deleted.

15. Gemaco manufactured the blackjack table, including the playing surface imprinted with Aruba and Carribean I, and sold it to Hyatt. In addition, and as noted above, it uses the maps in its advertising, both on printed brochures and its website, as examples of its ability to imprint gaming table tops with attractive images.

IV. CAUSES OF ACTION

16. For all causes of action, Plaintiff alleges that Hyatt Gaming and Hyatt Corporation operate as a single business enterprise, with a common objective and high levels of coordination, all directed toward support of the hotel and casino operated by Hyatt in Aruba and other places throughout the United States, Caribbean and Canada.² For this reason, they should be held jointly and severally liable for any damages and injunctive relief obtained from this action. Furthermore, for all causes of action, Plaintiffs contend that Hyatt Gaming and Hyatt Corporation are jointly and severally liable for any damages awarded because Defendants acted as a joint venture as evidenced by their agreed combination of resources to achieve a common pecuniary purpose, their varying degrees of control or authoritative voice in the conduct of that business, and a general plan to share in any profits therefrom.³

A) COPYRIGHT INFRINGEMENT & UNFAIR COMPETITION.

17. Defendants' use of Aruba and Caribbean I on the blackjack table constitutes an

² *National Plan Administrators, Inc. v. National Health Ins. Co.*, 150 S.W.3d 718, 743-747 (Tex.App.-Austin, 2004, *rev'd on other grounds* 235 S.W.3d 659) (defining single business enterprise doctrine).

³ See *Watts v. Green*, 190 S.W.3d 44, 50-51 (Tex.App.-Amarillo, 2005, *no writ*) (citing *St. Joseph Hospital v. Wolff*, 94 S.W.3d 513, 526 (Tex.2002) for doctrine of joint venture).

infringing act or series of actions as defined and as actionable under the federal Copyright Act of 1976, Title 17, United States Code. Defendants' activities also constitute unfair competition with Plaintiff.

18. Gemaco's use of Aruba and Caribbean I in its advertising constitutes a separate infringing act or series of actions as defined and as actionable under the federal Copyright Act of 1976, Title 17, United States Code. These activities also constitute unfair competition with Plaintiff.

B) DAMAGES

i. Actual Damages Under 17 U.S.C.A. § 504(b) for Use on Table Top.

19. Plaintiff has been damaged by Defendants' use of the maps on the table top as measured by the fair market license fee for the maps when their use is unauthorized by the copyright owner. Plaintiff is further entitled to any profits made by Defendants from their infringing acts as well as any actual damages to Plaintiff, including but not limited to, its lost revenue less any expenses that would have been attributable to the lost profit. Both measures of damages are prescribed by 17 United States Code Annotated, Section 504(b).

20. Plaintiff contends all Defendants are jointly and severally liable for any damages awarded for use of the maps on the table top. Specifically, Defendants are joint tortfeasors and Plaintiff may recover from them the entirety of the damages caused by and awarded based on the other's actions.⁴

ii. Actual Damages Under 17 U.S.C.A. § 504(b) for Gemaco's Use in Advertising.

21. Plaintiff has been damaged by Gemaco's use of the maps for advertising its

⁴ *Salton, Inc. v. Philips Domestic Appliances and Personal Care B.V.*, 391 F.3d 871, 877 (7th Cir. 2004) (holding that "[u]nder the principle of joint and several liability, which governs not only the common law tort of misappropriation of trade secrets but also the federal statutory tort of copyright infringement

products as measured by the fair market license fee for the maps when their use is unauthorized by the copyright owner. Plaintiff is further entitled to any profits made by Gemaco from their infringing acts as well as any actual damages to Plaintiff, including but not limited to, its lost revenue less any expenses that would have been attributable to the lost profit. Both measures of damages are prescribed by 17 United States Code Annotated, Section 504(b).

iii. Statutory Damages Under 17 U.S.C.A. §504(c) for Use on Table Top.

23. Plaintiff is entitled to the statutory damages set forth in 17 United States Code, Section 504(c), as an alternative to the actual damages and profit resulting from Defendants' use of Aruba and Caribbean I on the table top. Specifically, Plaintiff is entitled to a minimum of \$750.00 and a maximum of \$30,000.00 for said use.

24. In addition, Defendants' infringement was willful in that they had actual knowledge of Plaintiff's ownership of Aruba and Caribbean, or acted in reckless disregard of the possibility that their use of the works would infringe Plaintiff's copyrights. Specifically, Hyatt knew or reasonably should have known that Plaintiff owned the works since they are sold in various retail outlets in Aruba and the Caribbean, including one outlet in Defendants' hotel and casino which displays the maps prominently in its window. In addition, all of the maps, including the ones used to create the table, are imprinted Plaintiff's name, address, phone and fax number informing a reasonable person that that Plaintiff had an ownership interest in them. Defendants' failure to even contact Plaintiff to inquire about what that interest might have been, and proceed with use of the table, constitutes willful ignorance and was reckless.

25. In addition, Gemaco's actions were significantly reckless since it is in the printing business, and has a heightened awareness of copyright law and the need to verify that graphic

[citations omitted] the victim of a tort is entitled to sue any of the joint tortfeasors and recover his entire damages from that tortfeasor.").

material is properly licensed. For said willful infringement, Plaintiff is entitled to recover up to \$150,000.00 for each map infringed.

26. Plaintiff contends all Defendants are jointly and severally liable for any damages awarded for use of the maps on the table top. Specifically, Defendants are joint tortfeasors and Plaintiff may recover from them the entirety of the damages caused by and awarded based on the other's actions.⁵

iv. Damages Under 17 U.S.C.A. §504(c) for Gemaco's Use in Advertising.

27. Furthermore, Plaintiff is entitled to an award of statutory damages against Gemaco for its use of the maps in its advertising, a separate infringing act from use of the maps on the table tops.⁶ As set forth above, Gemaco's infringement was willful, and justifies an award of statutory damages up to \$150,000.00 for each map infringed.

B) INJUNCTIVE RELIEF

28. Pursuant to 17 U.S.C.A. § 1498, Plaintiff further requests that Defendants be permanently enjoined from the production, marketing and sale of anything imprinted with the maps.

29. In support of its request, Plaintiff would show that it has an inadequate remedy at law for Defendants' continuing infringement of the maps, even following an award of damages in this case. In particular, were Defendants to continuing their infringing activity, Plaintiff would be required to repeatedly sue them for damages. Irreparable harm exists justifying

⁵ *Salton, Inc. v. Philips Domestic Appliances and Personal Care B.V.*, 391 F.3d 871, 877 (7th Cir. 2004) (holding that "[u]nder the principle of joint and several liability, which governs not only the common law tort of misappropriation of trade secrets but also the federal statutory tort of copyright infringement [citations omitted] the victim of a tort is entitled to sue any of the joint tortfeasors and recover his entire damages from that tortfeasor.").

⁶ *Columbia Pictures Television v. Krypton Broadcasting of Birmingham, Inc.*, 106 F.3d 284, 294 (9th Cir. 1997, rev'd on other grounds 118 S.Ct.1279) (holding that acts of infringement in which another tortfeasor did not join justify separate award of statutory damages).

injunctive relief when a multiplicity of suits is the only method by which a party can obtain relief for an injury to his property rights.⁷

C) ATTORNEYS' FEES

30. Plaintiff is entitled to recovery of its costs and attorneys' fees reasonably incurred in pursuit of this action through trial, appeal to the Fifth Circuit Court of Appeals, and Supreme Court as set forth by 17 United States Code Annotated §505.

V. JURY DEMAND

31. Plaintiff demands trial by jury as to this action.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer herein, and that upon final trial, Plaintiff have the following:

- a) Such damages as Plaintiff has sustained in consequence of Defendants' infringement of Plaintiff's copyright, Defendants' unfair trade practices and unfair competition, and an accounting for all gains, profits, and advantages derived by Defendants through such infringement, trade practices, and unfair competition;
- b) In the alternative, Plaintiff seeks statutory damages as set forth by 17 U.S.C.A. §504(c), as well as an increase in said award for Defendants' willful infringement of same;
- c) Attorneys' fees and costs reasonably incurred as provided by 17 U.S.C.A. §505; and,
- d) such other and further relief to which Plaintiff may be justly entitled.

⁷ *Braniff Airways, Incorporated v. Toren*, 50 B.R. 393, 402 (N.D.Tex. 1984).

Respectfully submitted,

**BLAZIER, CHRISTENSEN, BIGELOW
& VIRR, P.C.**

Attorneys and Counselors at Law
221 West Sixth Street, Suite 1500
Austin, Texas 78701
512 476 2622
(Fax) 512 476 8685



JUSTIN M. WELCH

Texas State Bar No.: 24003876

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was delivered as set forth below on the 24th day of MARCH, 2009 to the attorneys of record as listed below by electronic delivery unless otherwise noted.

Nicholas Bressi
Hohmann, Taube & Summers, LLP
100 Congress Avenue, 18th Floor
Austin, Texas 78701



Justin M. Welch

CERTIFICATE OF REGISTRATION

FORM VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

RE:

VA 1-190-313



EFFECTIVE DATE OF REGISTRATION

APR 09 2003

Month Day Year



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
REGISTER OF COPYRIGHTS
United States of America

OFFICIAL SEAL ARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

NATURE OF THIS WORK ▼ See instructions

CARIBBEAN I

WATER COLOR PAINTING

PREVIOUS OR ALTERNATIVE TITLES ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a VICTOR W. BAKER

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

1954

Was this contribution to the work a "work made for hire?"

☒ Yes☐ No

Author's Nationality or Domicile

Name of Country

OR Citizen of ▼ USA

Domiciled in ▼

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ NoPseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture☐ Map☐ Technical drawing☒ 2-Dimensional artwork☐ Photograph☐ Text☐ Reproduction of work of art☐ Jewelry design☐ Architectural work

NAME OF AUTHOR ▼

b

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire?"

☐ Yes☐ No

Author's Nationality or Domicile

Name of Country

OR Citizen of ▼

Domiciled in ▼

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ NoPseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

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☐ 3-Dimensional sculpture☐ Map☐ Technical drawing☒ 2-Dimensional artwork☐ Photograph☐ Text☐ Reproduction of work of art☐ Jewelry design☐ Architectural work

3

a Year in Which Creation of This Work Was Completed

1991

This information must be given in all cases.

b Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month ▼

July

Day ▼

1

Year ▼

1991

UNITED STATES OF AMERICA

Nation

4

See instructions before completing this space.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

VICTOR W. BAKER

701 BRAZOS STREET, SUITE 500

AUSTIN, TEXAS 78701 - USA

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

APR 09 2003

ONE DEPOSIT RECEIVED

APR 09 2003

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

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• See detailed instructions.
• Sign the form at line 8.

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Page 1 of 2 pages

PLAINTIFF'S EXHIBIT A

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SDW

FORM VA

CHECKED BY

☐ CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

JUSTIN M. WELCH

BLAZIER, CHRISTENSEN, BIGELOW & VIRR, P.C.

221 WEST 6TH STREET, SUITE 1500

AUSTIN, TEXAS 78701 USA

Area code and daytime telephone number ▶ (512) 476-2622

Fax number ▶ (512) 476-8685

Email ▶ JWELCHJD@TEXAS.NET

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▶

☒ author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

VICTOR W. BAKER

Date ▶ 3 / 28 / 03

Handwritten signature (X) ▼

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼

JUSTIN M. WELCH

BLAZIER, CHRISTENSEN, BIGELOW & VIRR, P.C.

Number/Street/Apt ▼

221 WEST 6TH STREET, SUITE 1500

City/State/ZIP ▼

AUSTIN, TEXAS 78701

YOU MUST

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL RECEIPTS
IN THE SAME PACKAGE

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO
Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-6000

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

June 1999—100,000
WEB REV: June 1999

PRINTED ON RECYCLED PAPER

*U.S. GOVERNMENT PRINTING OFFICE: 1999-454-879/71

CERTIFICATE OF REGISTRATION



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 REGISTER OF COPYRIGHTS
 United States of America

FORM VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

VA 1-146-550



EFFECTIVE DATE OF REGISTRATION

5-1-02
 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, ATTACH A CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

ARUBA

NATURE OF THIS WORK ▼ See instructions

WATER COLOR PAINTING

PREVIOUS OR ALTERNATIVE TITLES ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NAME OF AUTHOR ▼

a VICTOR W. BAKER

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼
 1954

Was this contribution to the work a
 "work made for hire?"

☒ Yes
☐ No

Author's Nationality or Domicile
 Name of Country

OR { Citizen of ► USA
 Domiciled in ►

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No
 Pseudonymous? ☐ Yes ☐ No

If the answer to either
 of these questions is
 "Yes," see detailed
 instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

NAME OF AUTHOR ▼

b

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a
 "work made for hire?"

☐ Yes
☐ No

Author's Nationality or Domicile
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OR { Citizen of ►
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3

Year in Which Creation of This Work Was
 Completed

1997

This information
 must be given
 in all cases.

Date and Nation of First Publication of This Particular Work

Complete this information
 ONLY if this work
 has been published.

Month ► February Day ► 1 Year ► 1997

UNITED STATES OF AMERICA

Nation

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

VICTOR W. BAKER
 701 BRAZOS STREET, SUITE 500
 AUSTIN, TEXAS 78701 USA

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

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ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

MAY 01 2002

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PLAINTIFF'S EXHIBIT A

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Page 1 of 2 pages

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

EXAMINED BY _____	FORM VA
CHECKED BY _____	
<input type="checkbox"/> CORRESPONDENCE	FOR
Yes	COPYRIGHT
	OFFICE
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	ONLY

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PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

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b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP ▼

JUSTIN M. WELCH

BLAZIER, CHRISTENSEN, BIGELOW & VIRR, P.C.

221 WEST 6TH STREET, SUITE 1500

AUSTIN, TEXAS 78701 USA

Area code and daytime telephone number ▶ (512) 476-2622

Fax number ▶ (512) 476-8685

Email ▶ JWELCHJD@TEXAS.NET

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▶

☒ author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) A

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

VICTOR W. BAKER

Date ▶ 1/22/02

Handwritten signature (S) ▼

Certificate will be mailed in window envelope to this address:

Name ▼

JUSTIN M. WELCH

Number/Street/Apt ▼

BLAZIER, CHRISTENSEN, BIGELOW & VIRR, P.C.

221 WEST 6TH STREET, SUITE 1500

City/State/ZIP ▼

AUSTIN, TEXAS 78701

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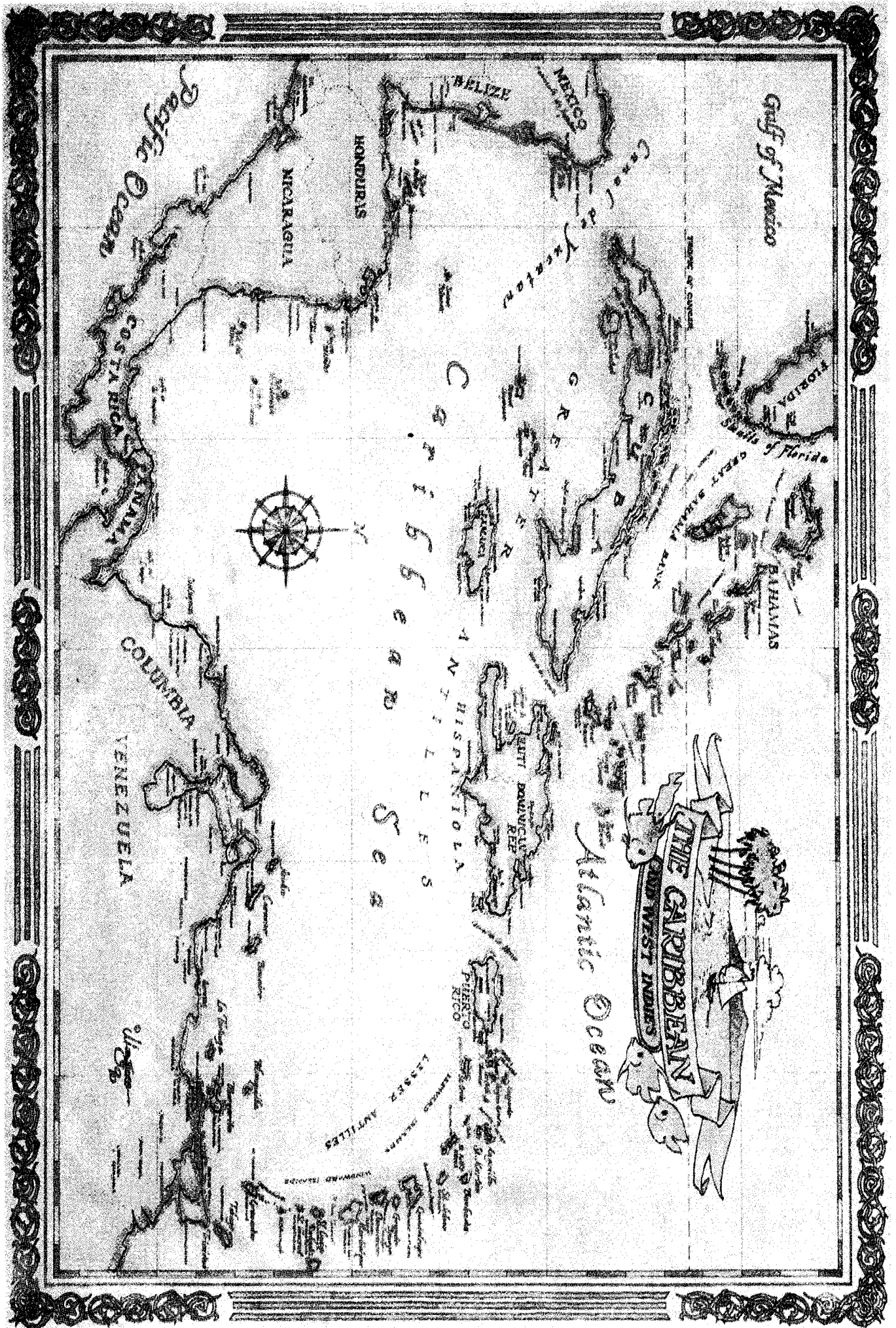
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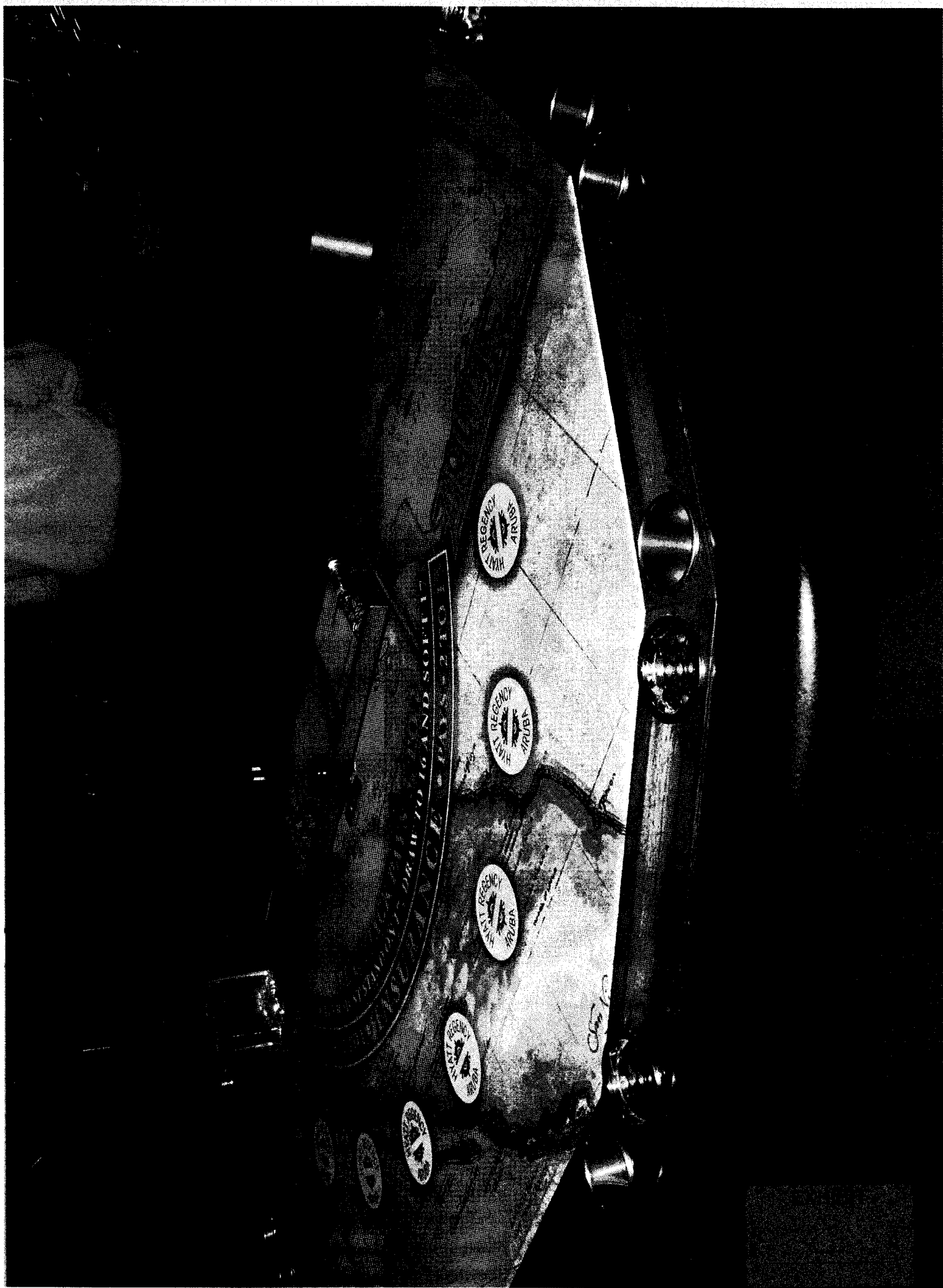
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2. Nonrefundable filing fee in check or money As of July 1, 1999, the filing fee for Form VA is \$30
3. Deposit material

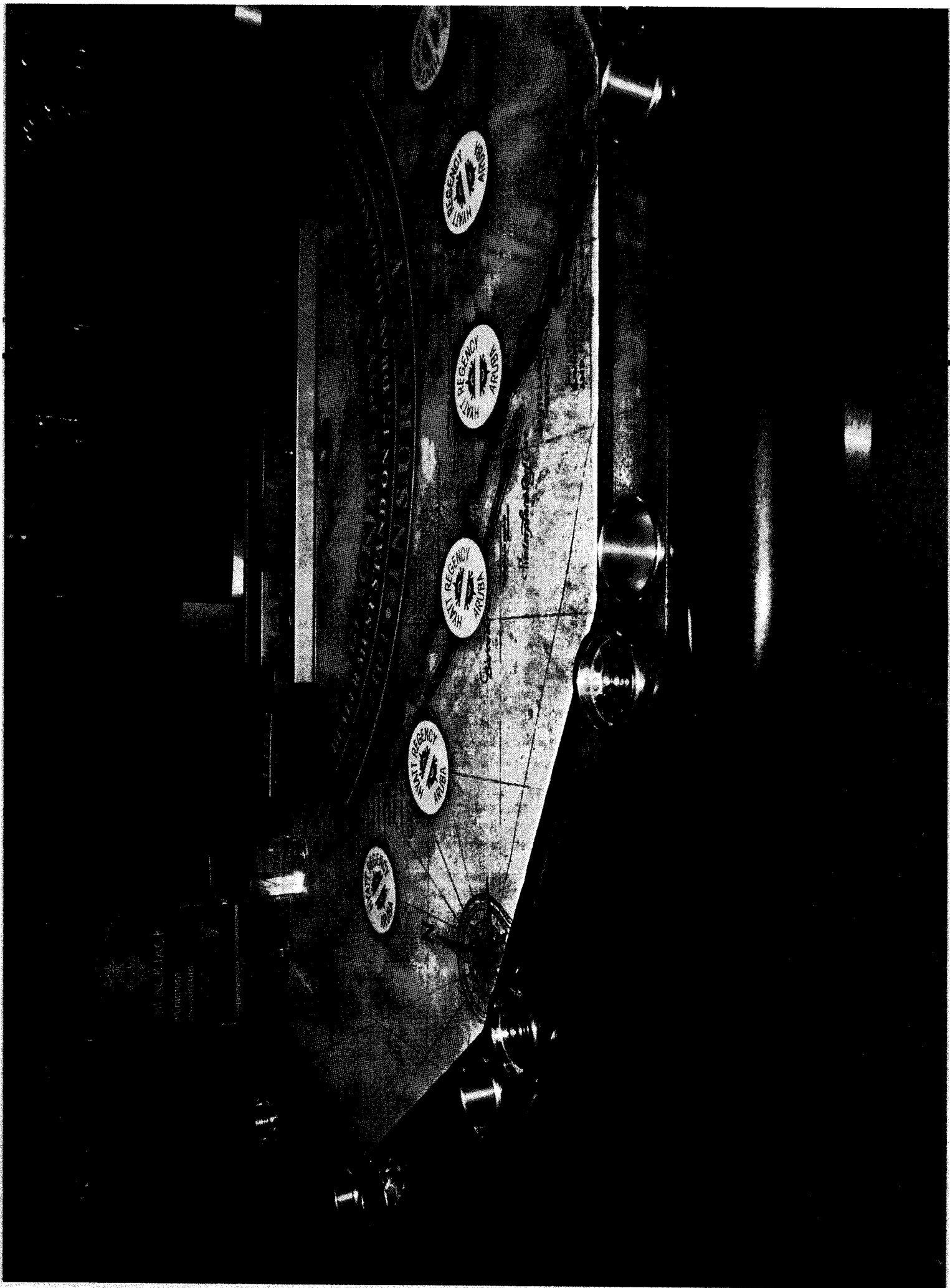
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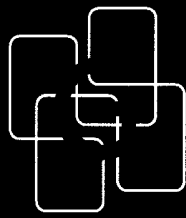
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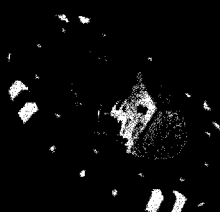
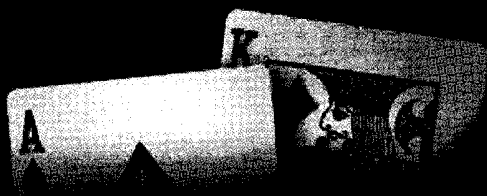


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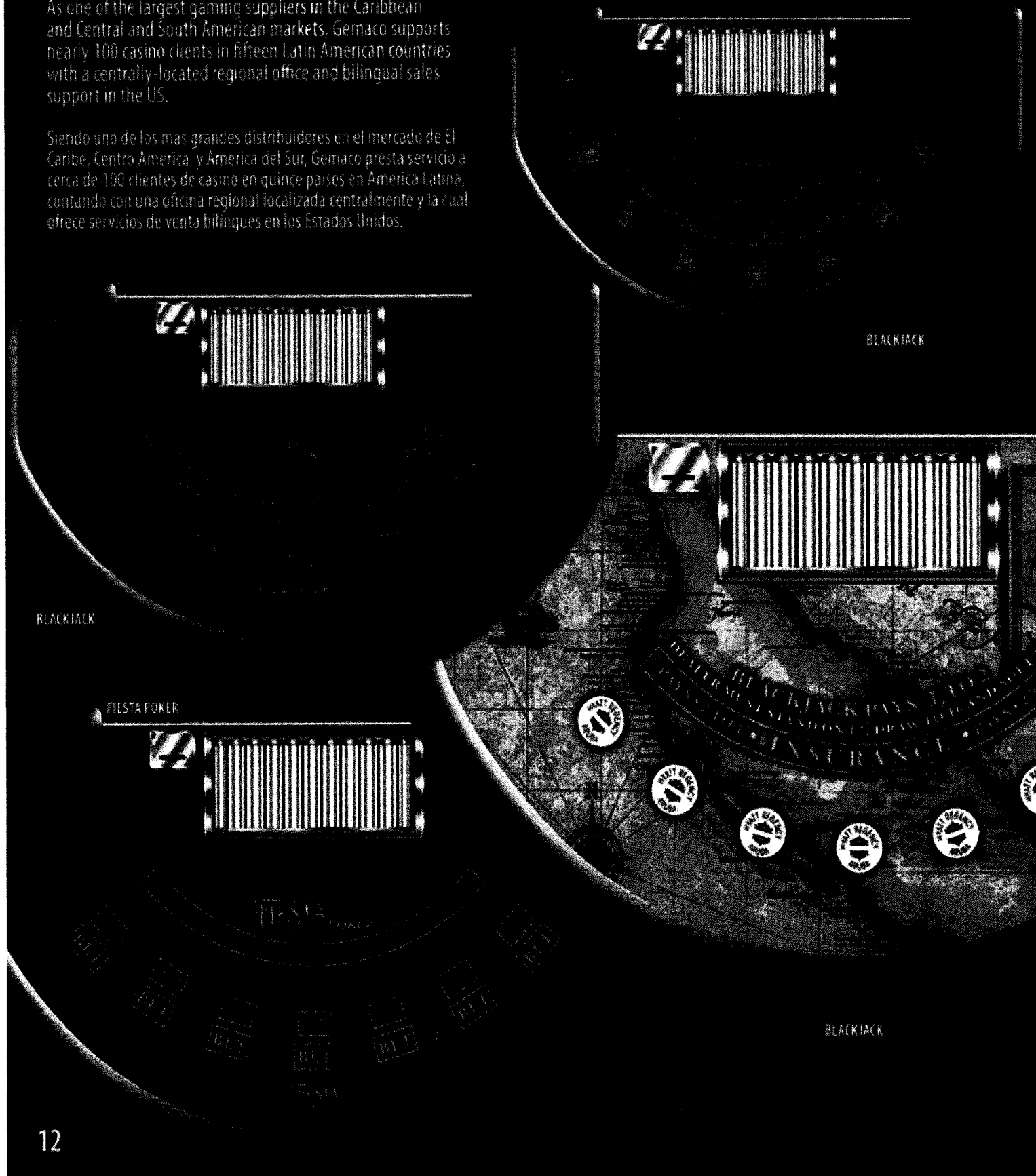


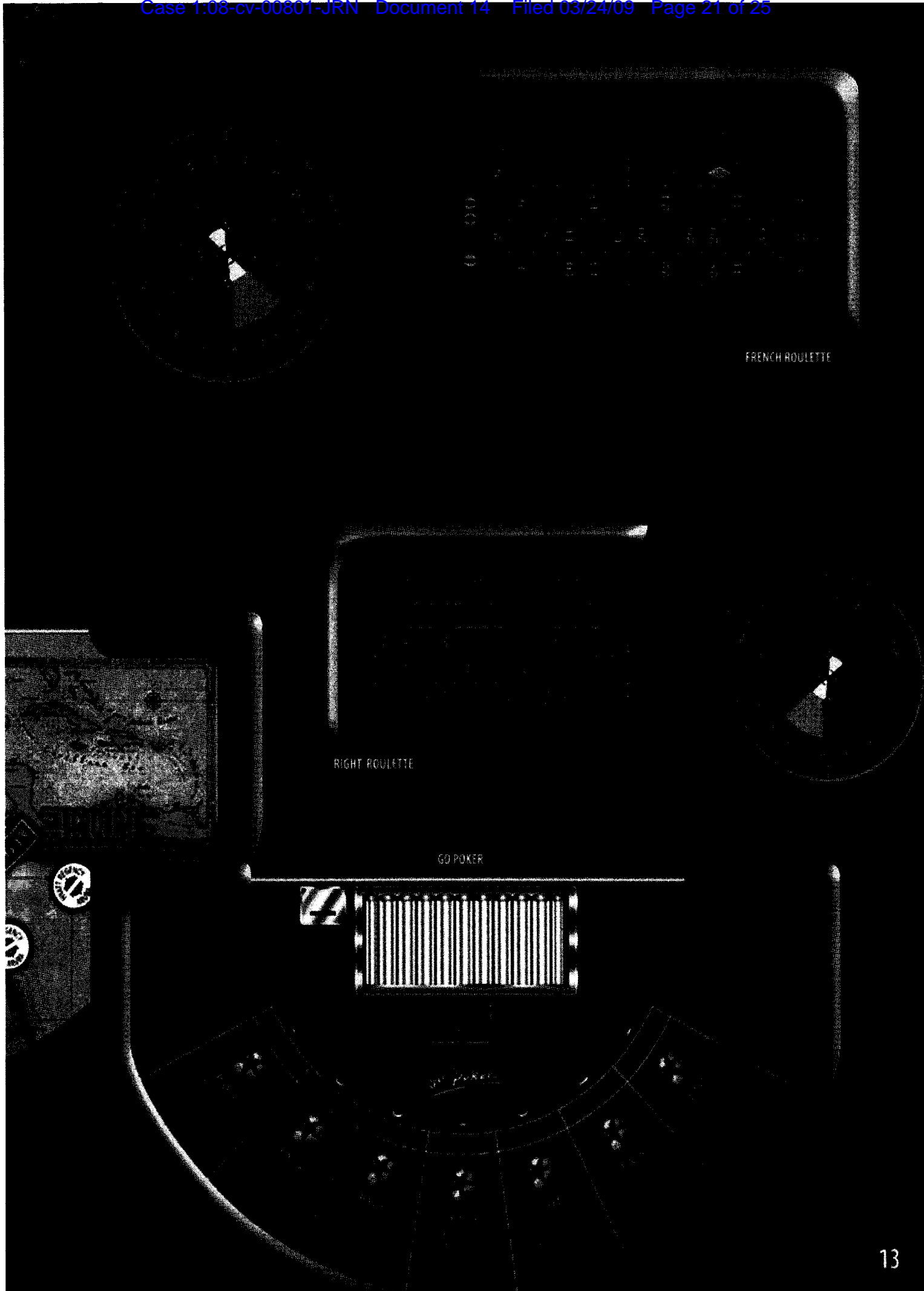
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As one of the largest gaming suppliers in the Caribbean and Central and South American markets, Gemaco supports nearly 100 casino clients in fifteen Latin American countries with a centrally-located regional office and bilingual sales support in the US.


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





































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
































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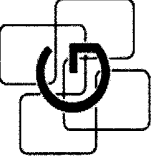
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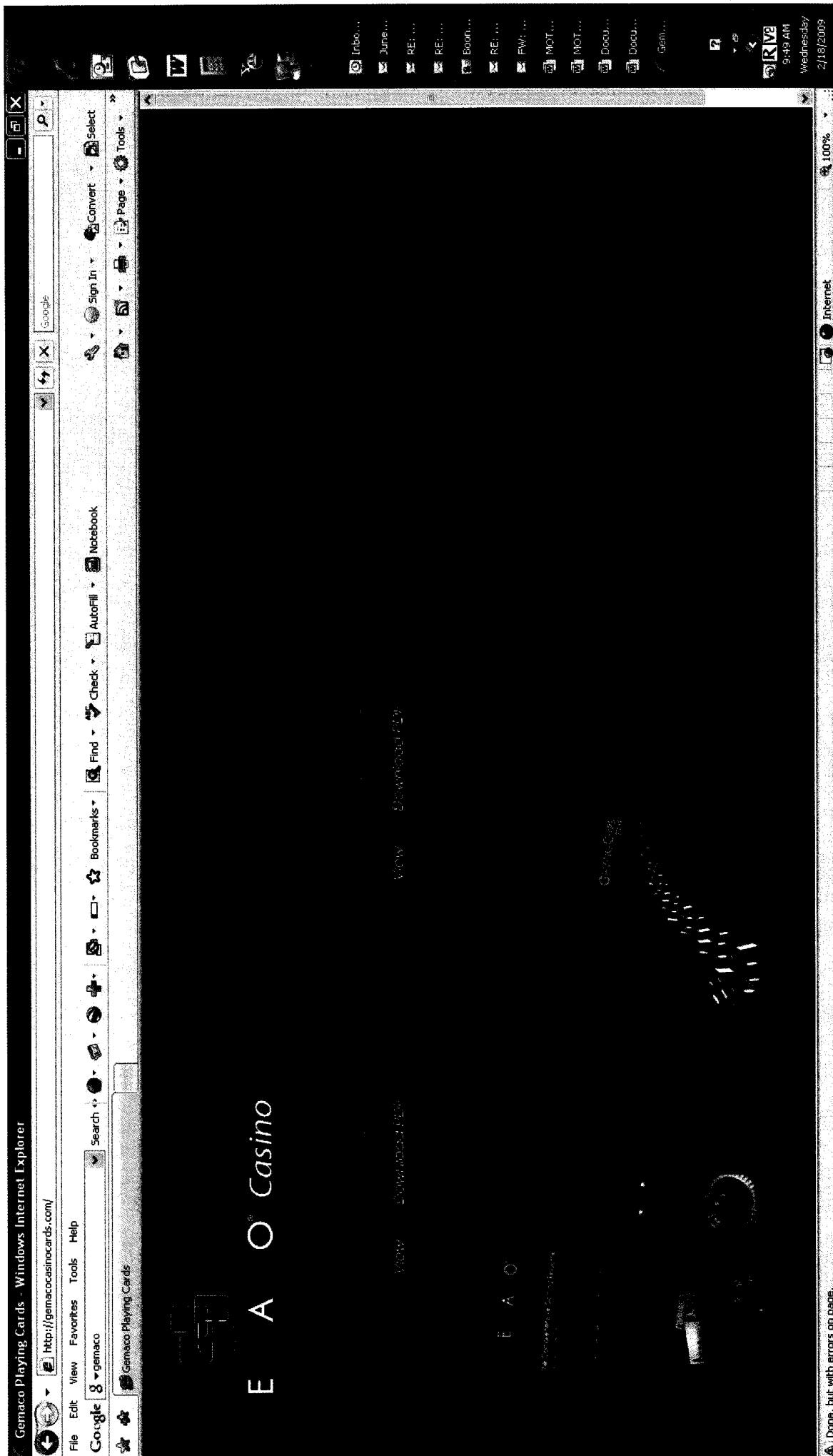
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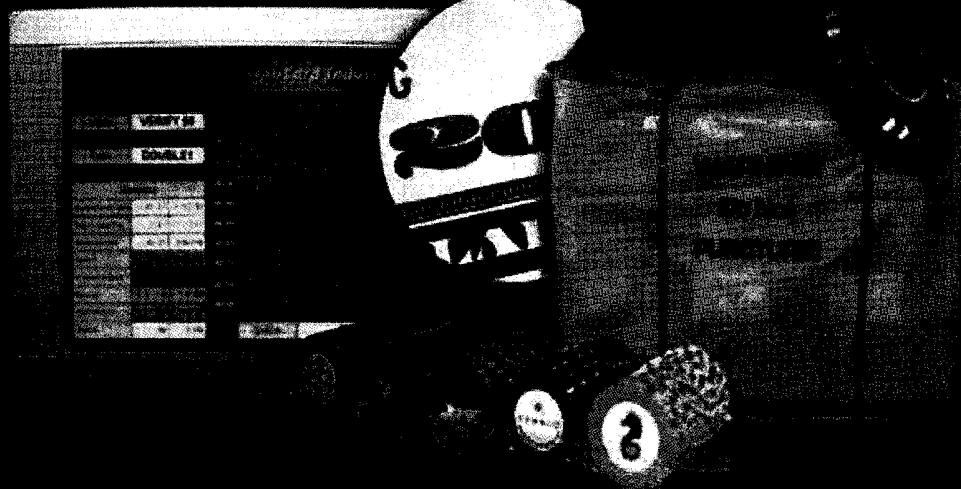


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